

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Barbara Jean Meekins	)	
	)	
	)	Case No. <u>14-34905-KRH</u>
	)	
	)	
Debtor(s)	)	Chapter <u>13</u>
	)	
Address	)	
171 Crater Woods Ct.	)	
Petersburg, VA 23805	)	
Last four digits of Soc Sec No(s): <u>0901</u>	)	
	)	
	)	

**Amended NOTICE OF MOTION (OR OBJECTION)**

Barbara Jean Meekins has filed papers with the court to Incur Debt.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before August 1, 2016, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.  
8501 Mayland Dr., Ste 106  
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on \_\_\_\_\_ at \_\_\_\_\_ . m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm <5100/5000> Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 7/18/2016

Signature, name, address, and telephone number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

America Law Group

8501 Mayland Dr., Ste 106

Henrico, VA 23294

Virginia State Bar No. 29640

Counsel for Barbara Jean Meekins

#### Certificate of Service

I hereby certify that I have this 18<sup>th</sup> day of July, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

### ***Creditors***

**American InfoSource LP as agent for**  
Verizon  
PO Box 248838  
Oklahoma City, OK 73124-8838

**Atlas Acquisitions LLC**  
294 Union St.  
Hackensack, NJ 07601

**Berks Credit & Coll**  
900 Corporate Dr  
Reading, PA 19605-0000

**Capital 1 Bank**  
Attn: General Correspondence  
Po Box 30285  
Salt Lake City, UT 84130-0000

**Cavalry Investments, LLC**  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595

**CERASTES, LLC**  
C O WEINSTEIN, PINSON, AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121

**Credit Acceptance**

Attn: Bankruptcy Dept  
25505 West 12 Mile Rd Ste 3000  
Southfield, MI 48034-0000

**Dominion Law Associates**

PO Box 62719  
Virginia Beach, VA 23462-0000

**Dominion Virginia Power**

P.O. Box 26666  
Richmond, VA 23261-0000

**Drive Time**

4020 E Indian School Rd  
Phoenix, AZ 85018-0000

**Dt Credit**

4020 E Indian School Rd  
Phoenix, AZ 85018-0000

**DT Credit Company LLC**

PO Box 29018  
Phoenix, AZ 85038

**ECMC**

PO BOX 16408  
St. Paul, MN 55116

**Focus Recovery Solutions**

Attn: Bankruptcy  
9701 Metropolitan Court Ste B  
Richmond, VA 23236-0000

**Jefferson Capital Systems LLC**

Po Box 7999  
Saint Cloud Mn 56302-9617

**Midland Credit Management, Inc**

as agent for MIDLAND FUNDING LLC  
PO Box 2011  
Warren, MI 48090

**Midland Funding**

8875 Aero Dr Ste 200  
San Diego, CA 92123-0000

**Nco Fin/38**

2360 Campbell Crk Ste 50  
Richardson, TX 75082-0000

**Nys Higher Ed Services**

99 Washington Ave  
Albany, NY 12255-0000

**Radiology Associates of Richmo**

PO Box 79923  
Baltimore, MD 21279-0000

**Synchrony Bank**

c/o Recovery Mgmt Systems Corp  
25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

**Synchrony Bank**

c/o of Recovery Management Systems Corp  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

**Verizon Communications**

P O Box 920041  
Dallas, TX 75392-0000

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In RE: Barbara Jean Meekins

Debtor

Case No.: 14-34905-KRH  
Chapter 13

**Amended MOTION TO PURCHASE AND FINANCE REAL PROPERTY**

Comes now the Debtor, by counsel, and as for his Motion to Purchase and Finance Real Property states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on 9/10/2014. Debtor desires to purchase and finance real property described below, from Scott & Lori Fielding, described as

Chesswood L 20 BK F SEC D

more commonly known as:

9031 Lost Forest Dr. Chesterfield, VA 23237.

2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334. This is a core matter.

3. The purchase price for the real property is \$142,000.00. The approximate closing costs are \$5,540.40.

4. The loan amount for the real property is \$137,030.00. The proposed balance is to be financed with C&F Mortgage. \$5,270 closing costs will be paid by the sellers or the sellers' agent. Debtor will pay \$1,472.83 in closing costs. The term of the loan is 360 months with an interest rate of 3.75%. Monthly principal, interest, taxes, & insurance payments are in the amount of \$923.97 for 360 months.

5. The purchase and financing of the real property would not prejudice the rights of any party, and would allow the debtor to comply with the terms of their confirmed Chapter 13 plan. The debtor has an opportunity to purchase a home with a payment within their means. The debtor's current budget allows for a rent payment in the amount of \$834.00 a month. Although the mortgage payment would be slightly higher than her current rent payment, Debtor feels confident she can cut expenses enough to afford the difference. She also believes that the benefits of home ownership will offset the higher household expense in the long term.

WHEREFORE, the Debtor, Barbara Jean Meekins, requests that the Court enter an Order authorizing the Purchase of Real Estate in accordance with the terms of the Purchase Agreement and the financing of real property in accordance with the terms of the Loan Agreement with C&F Finance, that the debtor be granted such motion.

DATED: 7/18/2016

BARBARA JEAN MEEKINS

By /s/Richard James Oulton  
Of Counsel

Richard James Oulton, Esquire  
VSB# 29640  
America Law Group, Inc.  
8501 Mayland Dr., Ste 106  
Richmond, VA 23294  
(804) 308-0051

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or mailed, by first class mail, a true and accurate copy of the foregoing Motion for the Purchase and Finance of Real Property and Request for Attorney Compensation was sent to the U.S. Trustee, Richmond, VA 23220 and Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780 and all creditors and necessary parties on 7/18/2016.

/s/Richard James Oulton  
Richard James Oulton

***Creditors***

**American InfoSource LP as agent for**  
Verizon  
PO Box 248838  
Oklahoma City, OK 73124-8838

**Atlas Acquisitions LLC**  
294 Union St.  
Hackensack, NJ 07601

**Berks Credit & Coll**  
900 Corporate Dr  
Reading, PA 19605-0000

**Capital 1 Bank**  
Attn: General Correspondence  
Po Box 30285  
Salt Lake City, UT 84130-0000

**Cavalry Investments, LLC**  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595

**CERASTES, LLC**  
C O WEINSTEIN, PINSON, AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121

**Credit Acceptance**  
Attn: Bankruptcy Dept  
25505 West 12 Mile Rd Ste 3000  
Southfield, MI 48034-0000

**Dominion Law Associates**  
PO Box 62719

Virginia Beach, VA 23462-0000

**Dominion Virginia Power**  
P.O. Box 26666  
Richmond, VA 23261-0000

**Drive Time**  
4020 E Indian School Rd  
Phoenix, AZ 85018-0000

**Dt Credit**  
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**DT Credit Company LLC**  
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**ECMC**  
PO BOX 16408  
St. Paul, MN 55116

**Focus Recovery Solutions**  
Attn: Bankruptcy  
9701 Metropolitan Court Ste B  
Richmond, VA 23236-0000

**Jefferson Capital Systems LLC**  
Po Box 7999  
Saint Cloud Mn 56302-9617

**Midland Credit Management, Inc**  
as agent for MIDLAND FUNDING LLC  
PO Box 2011  
Warren, MI 48090

**Midland Funding**

8875 Aero Dr Ste 200  
San Diego, CA 92123-0000

**Nco Fin/38**

2360 Campbell Crk Ste 50  
Richardson, TX 75082-0000

**Nys Higher Ed Services**

99 Washington Ave  
Albany, NY 12255-0000

**Radiology Associates of Richmo**

PO Box 79923  
Baltimore, MD 21279-0000

**Synchrony Bank**

c/o Recovery Mgmt Systems Corp

25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

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c/o of Recovery Management Systems Corp  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

**Verizon Communications**

P O Box 920041  
Dallas, TX 75392-0000

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In RE: Barbara Jean Meekins

Debtor

Case No.: 14-34905-KRH  
Chapter 13

**PROPOSED  
ORDER AUTHORIZING THE PURCHASE AND FINANCE REAL PROPERTY**

This matter came to be heard upon the Motion of the Debtor for the authority to purchase and finance real property, and it appearing to the Court that the debtor has the opportunity to purchase real property located at 9031 Lost Forest Dr. Chesterfield, VA 23237, for the purchase price of \$142,000.00, with approximate closing costs of \$5,540.40, and to finance the purchase through C&F Finance, by a loan in the amount of \$137,030.00 with an interest rate of 3.750%, and monthly principal, interest, taxes, & insurance payments in the amount of \$923.97 for 360 months. \$5,270 closing costs will be paid by the sellers or the sellers' agent. Debtor will bring an additional \$1,472.83 to closing.

The Court further determining that it does not prejudice the interests of the creditors and parties in interest in this case to allow this purchase and finance to take place, and for these reasons and other good cause shown, it is hereby

ORDERED that the debtor is authorized to PURCHASE & FINANCE real property, described as:

ALL that certain lot, piece or parcel of land with improvements thereon and appurtenances thereto belonging, lying and being in the said District, Chesterfield County, Virginia, shown and designated as Lot 20, Block F, Section D, on subdivision plat of Chesswood, recorded in the Clerk's Office, Circuit Court, Chesterfield County, Virginia, in Plat Book 40, Page 5

BEING the same real estate conveyed to Scott A. Fielding and Lori A. Fielding, husband and wife, by deed from Brian E. Shaw and Tina M. Hamlet dated February 25, 2014 and



to be recorded in the Clerk's Office of the Circuit Court of Chesterfield County, Virginia along with and immediately preceding this instrument.

more commonly known as:

9031 Lost Forest Dr. Chesterfield, VA 23237

and it is

FURTHER ORDERED that prior to the actual closing of this transaction, the settlement agent shall forward to counsel for the debtor and the chapter 13 trustee a proposed HUD-1 for review. It shall be the responsibility of counsel for the debtor to review these documents to assure that the terms of this Order and the payment of the proper amount to the Chapter 13 are provided for, and it is

FURTHER ORDERED that immediately after the closing the settlement agent shall provide a fully executed copy of the settlement statement and/or HUD-1 to counsel for the debtor and the Chapter 13 Trustee..

I ask for this:

/s/ Richard James Oulton  
Richard James Oulton  
Counsel for Debtor

Seen and approved:

\_\_\_\_\_  
Suzanne Wade  
Chapter 13 Trustee

Entered on Docket \_\_\_\_\_

\_\_\_\_\_  
U.S. Bankruptcy Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or by mail first class a true accurate copy of the Proposed Order to Authorize the Purchase and Finance of Real Property to all creditors and to all necessary parties on 7/18/2016.

/s/ Richard J. Oulton

Richard J. Oulton, Attorney for Debtor

PARTIES TO RECEIVE COPIES:

America Law Group, Inc.  
8501 Mayland Dr. Ste 106 Henrico, VA 23294

Suzanne Wade, Chapter 13 Trustee  
P.O. Box 1780 Richmond, VA 23219-1780

Barbara Meekins  
171 Crater Woods Ct. Petersburg, VA 23805

America Law Group, Inc.  
8501 Mayland Dr., Ste 106 Henrico, VA 23294